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May 21, 2021

**Via E-Mail – duewallc@gtlaw.com**

Greenberg Traurig, LLP  
1000 Louisiana Street  
Suite 1700  
Houston, TX 77002  
Attn.: Craig Duewall

**Re: Fieldwood’s Notice of Removal of Operator for Cause**

Dear Craig,

Fieldwood Energy LLC (“**Fieldwood**”) has received BP Exploration & Production Inc.’s (“**BP**”) letter dated May 19, 2021, which responds to Fieldwood’s May 14, 2021 notice of removal of BP as operator of the Loop Subsea Production System (the “**LSPS**”). Fieldwood disagrees with many if not all of BP’s positions set forth in the letter and reserves all of its rights. Rather than respond point by point, Fieldwood will make and reiterate a few key points.

BP has been removed as operator of the LSPS. The LSPS Construction and Operating Agreement’s (the “**LSPS OA**”) removal provision governs the removal of BP as operator, and the removal is appropriate. As required by the LSPS OA, Fieldwood will administer the election of the new LSPS Operator at the appropriate time.

The possibility and later reality of removal was a foreseeable consequence of Judge Isgur’s February 2, 2021 findings against BP. While arbitration is not required here, in any event Judge Isgur’s court would nevertheless be the proper forum to decide the question of arbitrability.

In response to BP’s suggestion, Mike Dane, Fieldwood’s Senior Vice President and Chief Financial Officer, is available to discuss next steps with Richard Eaton at a mutually agreed time. To be clear, however, any such meeting would necessarily occur outside of the dispute resolution provisions of the LSPS OA.

Fieldwood looks forward to working with BP to effectuate a smooth transition to the next LSPS operator.

Sincerely,

*/s/ Paul R. Genender*

Paul R. Genender